IN THE UNITED STATED DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
-VS-)	Case No. CR-14-332-R
)	
ALFRADA SANTIAGO,)	
)	
Defendant.)	

OBJECTIONS TO PRESENTENCING INVESTIGATION REPORT WITH SUPPORTING BRIEF

Comes now the Defendant, Alfrada Santiago by and through counsel, Irven R. Box, and after acknowledging having received a copy of the Presentence Investigation Report, and after having reviewed the report together, and for the purpose of making certain objections to the Presentence Investigation Report and for the purpose of preserving objections for appeal, defense counsel makes the following objections:

1. Alfrado Santiago objects to paragraph twenty nine (29) of the Presentence Investigation Report only as it relates to quantity of cocaine base for which the defendant is held accountable for a determination of the base offense level. Alfrada Santiago and the Government stipulated in the Plea Agreement to a drug quantity of an amount greater than 100 grams but less than 200 grams of cocaine powder.

Paragraph twenty nine (29) indicates a base offense level involving 80 grams of cocaine base making Mr. Alfrada Santiago base offense level of twenty four (24). Based on the plea agreement if accepted by the Court the base offense level would reduce from twenty four (24) to level sixteen (16) and after adjustment the

Defendant's total offense level would be level twelve (12). Combined with a criminal history category I, the Defendant's advisory guideline range would be ten (10) to sixteen (16) months.

WHEREFORE, premises considered, Defendant, Alfrada Santiago, prays the Court sustain his objections and concurrences to the Presentence Investigation Report and make the judicial findings necessary for Bureau of Prison purposes.

Respectfully submitted,

IRVEN R. BOX,

BY: /s/ Irven R. Box IRVEN R. BOX – OBA #1016 2621 S. Western

Oklahoma City, Oklahoma 73109

(405) 632-7778 (405) 632-8828 (Fax)

CERTIFICATE OF MAILING

This is to certify that on the 23rd day of September, 2015, a true and correct copy of the above and foregoing was mailed, with postage prepaid thereon, and sent by email to:

Ashley Altshuler Assistant U.S. Attorney 210 W. Park Ave., Suite 400 Oklahoma City, Oklahoma 73102 ashley.altshuler@usdoj.gov Michelle Matthews U.S. Probation Officer 215 Dean A. McGee, Suite 201 Oklahoma City, Oklahoma 73102 joel vandruff@okwp.uscourts.gov

Kerry Blackburn Assistant U.S. Attorney 210 W. Park Ave., Suite 400 Oklahoma City, Oklahoma 73102 kerry.blackburn@usdoj.gov

> /s/ Irven R. Box IRVEN R. BOX